

North Carolina
Department of Environment and Natural
Resources

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director

02.01-2/1/02-2955



February 1, 2002

Commander, Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699

Attention: Mr. Kirk Stevens
Navy Technical Representative
Code EV23

RE: NC Comments Site 84, Building
Revised Draft Work Plan for Phase I PCB
Cleanup and Foundation Removal
MCB Camp Lejeune

Dear Mr. Stevens:

The North Carolina Superfund Section has reviewed this document and our comments are attached. If you have any questions, please call.

Sincerely,

David J. Lown, LG, PE
Geological Engineer
Superfund Section

Attachment

cc: Gena Townsend, USEPA
Neal Paul, MCB Camp Lejeune

NC Superfund Comments
Revised Draft Work Plan for Phase I PCB Cleanup
And Foundation Removal, Site 84, Building 45
February 1, 2002

1. Table 3.2. The table contains no cleanup target for methylnaphthalene. The Region III RBC (acceptable if a Region IX PRG is not available) for 2-Methylnaphthalene is 1,600,000 ug/kg.
2. Table 3.2. Units should be ug/kg, not ug/l.
3. Section 3.3. Poly sheeting is proposed to be placed over the soils prior to backfilling. Netting might work better than sheeting. In certain situations, sheeting could eventually create problems with perched groundwater.
4. Section 4.3 Sampling and Analysis. Will a 5 percent lab check of field analysis provide sufficient numbers for statistics? Normally 10 percent is used.
5. Section 8.2 Characterization of Waste Streams. Based on previous sampling, pesticides are present in the waste materials. TCLP testing will determine if the pesticides are present at hazardous levels before selecting disposal options. In addition to TCLP results, care should be taken to consider the pesticide content of the soil before the disposal option is selected. For example, soils used as backfill, should not be left on the surface if it contains levels of pesticides greater than the Region IX PRGs.